

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Bryon J. Speakes, Special Agent (“SA”), Federal Bureau of Investigation (“FBI”), Youngstown, Ohio, hereinafter referred to as Affiant, being duly sworn, state that:

**AGENT BACKGROUND**

1. I am an investigative of law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510 (7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in 18 U.S.C. § 2516. I have been trained in advanced investigative techniques and have satisfied all requirements defined by the Federal Criminal Investigator Classification series established by the U.S. Office of Personal Management.
2. I have been employed as a Special Agent with the FBI since 2015. Currently, I am assigned to the Cleveland Division’s, Youngstown Resident Agency. In that capacity, I have been involved in numerous investigations, including those involving violations of narcotics and weapons related laws. In the course of my duties, I regularly serve subpoenas, conduct interviews, take sworn statements, execute search warrants, and otherwise gather evidence in furtherance of criminal investigations. These investigations include, but are not limited to, firearms offenses, drug crimes, crimes against children, national security, bank robbery, and white-collar crimes. I also testify in front of grand juries and in court. I am also assigned to the Mahoning Valley Violent Crimes Task Force (“MVVCTF”).
3. Over the course of my employment as a FBI Special Agent I have conducted and participated in multiple criminal investigations that have resulted in arrests for violent criminal offenses. The crimes resulted in subsequent convictions in Federal Courts.
4. This affidavit is being submitted for the limited purpose of establishing probable cause to believe that **ANDREW SAMUEL DAVIS STRICKLAND** (“STRICKLAND”), age 25, currently residing on Cambridge Avenue in Youngstown, Ohio, in the Northern District of

Ohio, Eastern Division, has committed violations of Title 18, United States Code, Sections 2251(a)—the Sexual Exploitation of Children.

5. The statements contained in this Affidavit are based in part on: information provided by FBI Special Agents, Task Force Officers (“TFOs”) and FBI Analysts, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, reporting by eye witnesses, independent investigation and analysis by FBI agents/analysts and computer forensic professionals, and my experience, training and background as a Special Agent of the FBI. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the foundation for the requested complaint.

6. This court has jurisdiction to issue the proposed warrant because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the court is a district court of the United States that has jurisdiction over the offense being investigated, *see* 18 U.S.C. § 2711(3)(A)(i).

#### BASIS FOR PROBABLE CAUSE

7. On July 7, 2019, a Farmdale, Ohio resident (hereinafter “WITNESS-1”) contacted the Trumbull County, Ohio, Sheriff’s Office to report a sexual assault that was committed upon WITNESS-1’s infant child (hereinafter Minor Victim-1 [“MV-1”]). WITNESS-1 reported that the sexual assault on MV-1 was committed by WITNESS-1’s 16-year-old relative (hereinafter Minor Victim-2 [“MV-2”]).

8. On July 8, 2019, Trumbull County Sheriff’s Office Detective Jolene Marcello (“Det. Marcello”) interviewed the spouse of WITNESS-1 (hereinafter “WITNESS-2”), and MV-

2 at the Trumbull County Sheriff's Office. WITNESS-2 stated that on or about July 4, 2019 that WITNESS-2's family, which included MV-1 and MV-2, drove from their Farmdale residence to the Clark County fairgrounds to watch a horse show. On July 7, 2019, WITNESS-2 was contacted via telephone by a sibling (hereinafter "WITNESS-3") who stated that she/he received a video which purportedly showed a sex act being committed between MV-1 and MV-2. The video was sent to WITNESS-3 via Facebook by user named, "Andrew Strickland."

**STRICKLAND** then provided his cellular telephone number to WITNESS-3 in order to have WITNESS-2 contact him [**STRICKLAND**]. The number provided to WITNESS-2 was 234-228-5201 (hereinafter Target Telephone-1 ["TT-1"]).

9. On or about July 7, 2019, WITNESS-2 contacted **STRICKLAND** via Facebook. **STRICKLAND** then provided WITNESS-2 the video of the sex act being committed between MV-1 and MV-2. The video depicted MV-2 engaging in oral sex on MV-1 and appeared to take place within a camper at the Clark County fairgrounds.

10. During an interview MV-2 told Det. Marcello that the sex act only happened once and occurred within a camper located in Springfield, Ohio<sup>1</sup>.

11. On or about July 8, 2019, Det. Marcello went to the Farmdale residence of MV-2. Det. Marchello then observed the video which showed the July 6, 2019 sex act that was maintained on WITNESS-2's cellular telephone.

12. According to MV-2, in an interview with Det. Marcello, stated that on or about July 1, 2019, **STRICKLAND** contacted MV-2 via Facebook in the form of a friend request. **STRICKLAND** then started to communicate with MV-2 via Facebook's Messenger platform. **STRICKLAND** requested that MV-2 share naked images of MV-2 ("nudes") to him. MV-2 first denied **STRICKLAND**'s request to provide him with nudes. MV-2 then deleted

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<sup>1</sup> Clark County and Springfield, Ohio is in the Southern District of Ohio.

**STRICKLAND** profile from MV-2's friends list. **STRICKLAND**, at a later time, created approximately four other Facebook user profiles and re-contacted MV-2. MV-2 again accepted **STRICKLAND**'s Facebook friend request. **STRICKLAND** again requested nudes from MV-2. MV-2 provided **STRICKLAND** with publicly available nude images of other persons which MV-2 found on the Internet. At this point **STRICKLAND** threatened MV-2 to provide him with nude images. **STRICKLAND** then provided three nude images of himself to MV-2. MV-2 could see **STRICKLAND**'s face on two of the images. MV-2 could identify that the images were in fact of **STRICKLAND** by comparing those images to photographs on **STRICKLAND**'s Facebook profile.

13. Further, according to MV-2, one of the images depicted a naked **STRICKLAND** with a small dog. **STRICKLAND** then messaged MV-2 and stated, "isn't it [the dog] cute [?]" MV-2 again provided **STRICKLAND** with publicly available nude images of other persons which MV-2 found on the Internet. **STRICKLAND** stated that he would send the nude images, provided to him by MV-2, to MV-2's family. **STRICKLAND** told MV-2 that he was aware that MV-2 was in Springfield (Ohio). **STRICKLAND** in viewing MV-2's Facebook pictures, asked about the identity of MV-1 and other children that appeared on MV-2's Facebook account. MV-2 then provided to **STRICKLAND** MV-1's identity. **STRICKLAND** then told MV-2 to perform a sex act on a horse or on MV-1. MV-2, believing that **STRICKLAND** would either harm MV-2 or MV-2's family committed the sex act on MV-1. MV-2 used a cellular phone to record the sex act and provided the recording to **STRICKLAND** via Facebook Messenger, as requested by **STRICKLAND**. After MV-2 sent the video, **STRICKLAND** stated that he could not believe how far he had gotten with MV-2. **STRICKLAND** continued, that he has never gotten that far with other people he has asked to do similar sex acts for him in the past.

14. On or about July 8, 2019, Det. Marcello then collected the cellular telephones of WITNESS-2 and MV-2 as evidence. The cellular telephones used by WITNESS-2 and MV-2 are further identified as:

- a. A black LG Aristo II with International Mobile Equipment Identity (IMEI) 352737102624237, bearing a telephone number of 234-232-XXXX [REDACTED] (hereinafter Target Telephone-2 ["TT-2"]). TT-2 is associated with WITNESS-2; and
- b. A silver LG Aristo II with International Mobile Equipment Identity (IMEI) 3587720869644378, bearing a telephone number of 814-550-XXXX [REDACTED] (hereinafter Target Telephone-3 ["TT-3"]). TT-3 is associated with MV-2.

15. On or about July 8, 2019, Det. Marcello conducted an OHLeg search of "Andy Strickland" and located an **ANDREW SAMUEL DAVIS STRICKLAND**, date-of-birth (DOB) XX-XX-1995 [REDACTED], residing on Winchester Avenue in Youngstown, Ohio.

16. On July 15, 2019, Det. Marcello obtained consent for law enforcement to search the cellular telephones belonging to WITNESS-2 and MV-2.

17. On July 15, 2019, Det. Marcello transferred the custody of WITNESS-2's and MV-2's cellular telephone to Clark County, Ohio, Sheriff's Office Detective Debra Strileckyl.

18. On July 23, 2019, I was contacted by FBI SA Andrea Kinzing ("SA Kinzing") of the Cincinnati FBI. SA Kinzing informed me that she received the cellular telephones belonging to WITNESS-2 and MV-2 and was proceeding with extraction the content from the devices.

19. On July 24, 2019, I served Facebook with preservation orders to maintain the Facebook accounts associated with **STRICKLAND**, MV-2, and WITNESS-3.

20. On July 24, 2019, a FBI Confidential Human Source (CHS) with access to personally identifiable information (PII) for residents and their dependents within the state of

Ohio identified the following information for **STRICKLAND**:

Address: XXX Cambridge Avenue, Youngstown, Ohio 44502 [REDACTED]

Telephone Number: 234-228-5201 (TT-1)

21. On July 24, 2019, I subpoenaed T-Mobile device 234-228-5201 (TT-1), for basic subscriber information and tolls from the timeframe of January 1, 2019 through July 20, 2019.

22. On July 26, 2019, I received the Cellebrite extraction reports for cellular devices TT-1 and TT-2.

23. On July 26, 2019, I examined the results of the digital extraction of TT-1 and discovered numerous SMS and MMS text messages between WITNESS-2 (TT-2) and TT-1.

24. On July 26, 2019, T-Mobile returned the subpoena with the following account information for TT-1:

Subscriber Name: Jessie Strickland

Subscriber Address: XXX Cambridge Avenue, Youngstown, Ohio [REDACTED]

IMSI: 310260351263929

IMEI: 351603100968020

Account Active Since: December 4, 2018

25. On July 31, 2019, the Honorable Judge John M. Durkin, Mahoning County, Ohio, Common Pleas Court authorized the search of four Facebook accounts associated with **STRICKLAND**, WITNESS-3, and MV-2 from June 1, 2019 through July 22, 2019.

26. On August 1, 2019, Facebook provided me with four Facebook accounts associated with **STRICKLAND**, WITNESS-3, and MV-2. Facebook provided the following information for Facebook account number, 100022576031943:

First Name: Andrew

Last Name: Strickland

Vanity Name: andrew.strickland.1840

Account Phone Number: +13305020203 Cell Verified

27. On August 6, 2019, I examined the results of the digital extraction of TT-3 and

discovered numerous SMS and MMS text messages between MV-2 (TT-3) and TT-1.

28. On August 6, 2019, I reviewed the Facebook return for account 100022576031943, associated to **STRICKLAND**. Listed within the account's friends list is the account associated with WITNESS-3.

29. On August 6, 2019, SA Speakes reviewed the Facebook return for the account associated to WITNESS-3 and discovered numerous Facebook Messenger messages between WITNESS-3 and **STRICKLAND** using Facebook account number, 100037198835847.

30. On October 24, 2019, the Honorable Judge Maureen Sweeney, Mahoning County, Ohio, Common Pleas Court authorized the search of electronics in the possession of **STRICKLAND**. This included items such as cellular telephone(s), tablets, computers and Internet based electronic items.

31. On October 25, 2019, the Ohio Bureau of Criminal Investigation-Crimes Against Children (BCI-CAC) the FBI's Mahoning Valley Violent Crimes Task Force (MVVCTF), and the Trumbull County Sheriff's Office executed the search warrant at **STRICKLAND**'s home on Cambridge Avenue in Youngstown, Ohio. Located within the residence was **STRICKLAND**, Jessie Strickland, Leah Ervin (**STRICKLAND**'s mother), Carl James Ervin III (**STRICKLAND**'s stepfather) and **STRICKLAND**'s infant son.

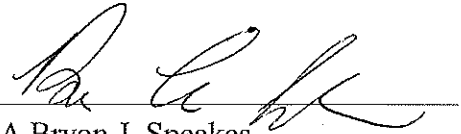
32. **STRICKLAND** stated that he met MV-2 on Facebook on or about July 2019 on Facebook. **STRICKLAND** then maintained contact with MV-2 for a period of approximately a month via Facebook's Messenger application. During that period **STRICKLAND** stated that he convinced MV-2 that they were in a relationship. **STRICKLAND** then said that he produced approximately 5 to 6 nude images of himself and distributed them to MV-2. In turn, MV-2 produced approximately 10 to 11 images of MV-2, which included 3 or 4 close-up pictures of

MV-2's genitals and then distributed them to **STRICKLAND**. **STRICKLAND** stated that at one point in his conversation with MV-2, he grew concerned of MV-2 contacting him via Facebook Messenger. **STRICKLAND** grew afraid that either his mother, Leah Ervin, or his wife, Jessie **STRICKLAND** would become aware that he was contacting a person he knew was a minor. At this point **STRICKLAND** told MV-2 to perform oral sex on MV-1 or a horse. **STRICKLAND** described MV-1's age as either 1 or 2 years of age. **STRICKLAND** stated that once he received the video of the sex act from MV-2, he then distributed it to WITNESS-2 and WITNESS-3. **STRICKLAND** also admitted to making up alias(es) to hide his identity in order to avoid criminal reprisals from law enforcement.

#### CONCLUSION

33. Based on the foregoing, there is probable cause to believe that **ANDREW SAMUEK DAVIS STRICKLAND** has committed violations of Title 18, United States Code,

Sections 2251(a)—the Sexual Exploitation of Children. Accordingly, I respectfully request the court issue a warrant for the arrest of **STRICKLAND**.



SA Bryon J. Speakes  
Federal Bureau of Investigation

Sworn to and subscribed before me this 26 day of February 2020.



HONORABLE GEORGE J. LIMBERT

U.S. MAGISTRATE JUDGE